Joshua Wurtzel Partner SCHLAM STONE & DOLAN LLP

jwurtzel@schlamstone.com schlamstone.com 26 Broadway, New York, NY 10004 Main: 212 344-5400 Fax: 212 344-7677 Direct: 212 612-1226 Mobile: 516 528-9944

September 16, 2024

BY ECF

The Honorable Edgardo Ramos United States District Court Southern District of New York 40 Foley Square, Courtroom 619 New York, New York 10007

MEMO ENDORSED, pg. 2.

Re: Money Tree Capital Funding, LLC v. Money Tree Capital Markets, LLC, et al., Case No. 22-cv-10084-ER

Dear Judge Ramos:

The parties in this matter write jointly to propose an amended schedule for this matter following the parties' unsuccessful efforts to resolve this matter through mediation. The parties jointly propose the following schedule:

November 22, 2024: Deadline to serve any further interrogatories, including

expert interrogatories.

November 22, 2024: Deadline to serve requests to admit, if any.

November 22, 2024: Deadline to complete depositions of fact witnesses.

December 2, 2024: Deadline to serve expert reports.

December 19, 2024: Deadline to serve rebuttal expert reports.

The week of The next case management conference to be scheduled January 6, 2025: during this week or at such date the Court deems proper.

January 10, 2025: Deadline to complete expert depositions.

January 13, 2025: Deadline to complete all discovery.

The parties jointly request that this Court so order the proposed revised scheduling order attached hereto. We thank the Court for its time and attention to this matter.

Page 2 of 2

The Honorable Edgardo Ramos September 16, 2024 Page 2 of 2

Respectfully submitted,

/s/ Joshua Wurtzel

Joshua Wurtzel

cc: All counsel of record (by ECF)

The proposed schedule is approved. A case management conference will be held on January 15, 2025, at 11 a.m.

SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 9/18/2024
New York, New York